

Exhibit E

Robinson+Cole

ANDREA DONOVAN NAPP

280 Trumbull Street
Hartford, CT 06103-3597
Main (860) 275-8200
Fax (860) 275-8299
anapp@rc.com
Direct (860) 275-8206

Also admitted in New York

Via ECF

April 2, 2015

The Honorable Kenneth M. Karas
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: *Congregation Rabbinical College of Tartikov, Inc., et al. v. Village of Pomona, et al.*, 7:07 CV 6304 (KMK) (JCM)

Dear Judge Karas:

Defendants write in response to Plaintiffs' letter of March 26, 2015 requesting a pre-motion conference in advance of filing a motion for sanctions. While Defendants do not object to Plaintiffs' request for a conference, Defendants dispute the allegations and characterizations contained in Plaintiffs' letter. Specifically, Defendants deny any discovery misconduct and disagree that they have engaged in "blatant bad faith destruction of evidence" or a "deliberate pattern of deliberate deceit and spoliation" or that "the sitting mayor and a trustee actively conspired to conceal the post by taking it down." More importantly, Defendants dispute that the information Plaintiffs now seek is responsive to Plaintiffs' discovery requests as narrowed by Judge Yanthis' order of October 4, 2013.

Although Defendants do not believe that a motion for sanctions is appropriate, in the event the Court so orders, Defendants respectfully reserve their right to further brief these issues.

Sincerely,



Andrea Donovan Napp

CC: All counsel of record